

7 PAGES
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**UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA FRESNO**

In re:

ADAM AGCAOILI

Debtor(s).

Case No.: 19-14103 - B - 13K

DC No: PK-1

Chapter 13
 EXHIBITS IN SUPPORT OF
 APPLICATION FOR PAYMENT OF FEES
 AND/OR EXPENSES PURSUANT TO
 11 U.S.C. §331 OR §330

☐ INTERIM
☒ FINAL

DATE: January 11, 2024
 TIME: 9:30 a.m.
 PLACE: U.S. Courthouse, Ctrm 11, 5th Floor
 2500 Tulare Street
 Fresno, CA

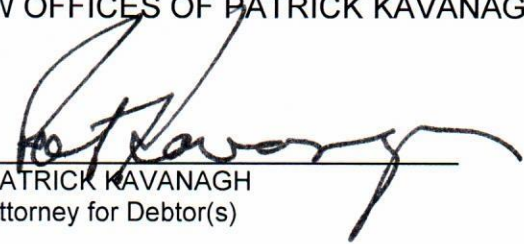
JUDGE: Hon. JENNIFER E. NIEMANN

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DATED: 12/20/23

Respectfully Submitted,

LAW OFFICES OF PATRICK KAVANAGH

By 
 PATRICK KAVANAGH
 Attorney for Debtor(s)

NARRATIVE

This bankruptcy was triggered by the foreclosure of a deed of trust. As soon as the case was filed, I called and faxed the foreclosing creditor.

The only claim filed was the deed of trust claim. Several potential creditors were listed as having a zero balance. This was done because there was collection activity or the creditor appear on the credit report.

One of the non-standard tasks was a review of the debtor's girlfriend's credit report to see if any of the debtor's debts appeared. The illegality of this phenomena notwithstanding, it happens often enough that it has a name, "parking".

Included in petition preparation are 2 tasks that could have been under independent review. This include a review of the recorded documents with the Kern County recorder and a review of the debtor's credit report.

I am seeking approval of \$5,700.00 in attorney fees. In light of the \$1,000.00 received prior to filing, the balance payable by the trustee.

NARRATIVE**EXHIBIT A**

Date	Cod Desc	Staff	Total D	Gross
9/17/2019 A	Initial Client conference to review questionnaire and collect documents.	PK	1.10	330.00
9/18/2019 B	Review girlfriends credit report	PK	0.20	60.00
9/22/2019 P	Draft letter/fax to First American Title (foreclosure trustee) re: filing of bankruptcy and automatic stay. Follow up Telephone call.	PK	0.30	90.00
9/26/2019 B	Work on petition including preparing short form petition.	PK	1.00	300.00
9/27/2019 A	Client telephone conference re: filing and re: certificate.	PK	0.10	30.00
9/27/2019 B	Review email and certificate from Summit and follow up filing. Client conference to review, edit and sign short form petition.	PK	0.30	90.00
9/27/2019 A	Discuss case in general.	PK	0.70	210.00
9/27/2019 B	Finish short form petition.	PK	0.20	60.00
9/30/2019 P	Trip to foreclosure sale to notify them of bankruptcy. (NB: we were advised that it takes 24 hours to be effective.)	PK	0.50	150.00
10/1/2019 P	Review trustee document request.	PK	0.10	30.00
10/2/2019 P	Review Notice of incomplete filing. Confirm that deadline is calendared.	PK	0.10	30.00
10/7/2019 P	Review request for special notice - Wilmington Savings Bank	PK	0.10	30.00
10/9/2019 E	Draft plan	PK	1.20	360.00
10/9/2019 B	Finish petition	PK	1.10	330.00
10/10/2019 E	Client conference to review, edit and sign plan.	PK	0.20	60.00
10/10/2019 B	Client conference to review, edit and sign petition.	PK	0.70	210.00
10/15/2019 P	Document collection for trustee.	PK	0.70	210.00
10/16/2019 P	TC-Lindsay at trustee's office.	PK	0.20	60.00
11/1/2019 F	Review notice of commencement of case, calendar 341 Meeting of Creditors	PK	0.20	60.00
11/26/2019 F	Preparation for and appear at 341 Meeting of Creditors	PK	1.00	300.00
12/4/2019 E	Review email from trustee's office re: OCP. Review and sign OCP. Email to trustee's office.	PK	0.20	60.00
12/19/2019 P	Client conference to review TFS procedure, what to do in case. Review notice of intent to close without discharge-no second class. Email to client re: same.	PK	0.40	120.00
1/11/2020 P	Review statement from Seline. Letter to client re: same.	PK	0.30	90.00
1/20/2020 P	Review certificate of debtor education.	PK	0.20	60.00
2/12/2020 P	Client telephone conference re: his inability to get a statement that shows what the late fee is.	PK	0.10	30.00
2/13/2020 P		PK	0.20	60.00

EXHIBIT B
ITEMIZED TIME BY DATE

2/19/2020	P	Review notice of mortgage change, letter to client re: same.	PK	0.20	60.00
4/2/2020	P	Review email from client and respond.	PK	0.10	30.00
4/17/2020	K	Review motion to dismiss. Follow up resolution.	PK	0.40	120.00
5/4/2020	K	Review withdrawal of trustee's motion to dismiss	PK	0.10	30.00
5/12/2020	P	Review order as signed by Court.	PK	0.10	30.00
5/13/2020	P	Client telephone conference re: letter from trustee re: payment increase. (I have not rec'd letter). Review letter later in day.	PK	0.20	60.00
5/14/2020	P	Client telephone conference re: letter from trustee re: payment increase.	PK	0.20	60.00
6/19/2020	J	Review notice of filed claims, letter to client re: same. Review of p o c on house. Check file and PACER for additional claims.	PK	0.40	120.00
8/25/2020	P	Review statement from Selene Financial. Letter to Selene with copy of letter and statement to client, requesting that they send statements to client rather than to me.	PK	0.30	90.00
12/14/2020	P	Brief review of trustee's annual report and letter to client re: same	PK	0.20	60.00
1/19/2021	P	Client telephone conference re: to complete	PK	0.20	60.00
8/27/2021	P	Client telephone conference re: re: to complete	PK	0.10	30.00
2/2/2022	P	Review notice of mortgage payment change and letter to client re: same	PK	0.20	60.00
2/23/2022	P	Review change in mortgage payment and letter to client re: same	PK	0.20	60.00
4/4/2022	P	Review notice of change of address for QWR	PK	0.10	30.00
6/6/2022	P	Review notice of change of address- Wilmington Savings	PK	0.10	30.00
12/20/2022	P	Review notice of mortgage payment change and letter to client re: same	PK	0.20	60.00
11/29/2023	P	Review email/letter from Mai Ko Vang at trustee's office.	PK	0.10	30.00
12/13/2023	N	Draft final fee application	PK	2.00	600.00
12/18/2023	P	Review notice of mortgage change, letter to client re: same.	PK	0.20	60.00
3/15/2024	O	[Projected/estimated] Case closing.	PK	2.00	600.00
				<u>19.00</u>	<u>5,700.00</u>

EXHIBIT B
ITEMIZED TIME BY DATE

Date	Cod	Desc	Staff	Total D	Gross
9/17/2019	A	Initial Client conference to review questionnaire and collect documents.	PK	1.10	330.00
9/27/2019	A	Client telephone conference re: filing and re: certificate.	PK	0.10	30.00
9/27/2019	A	Client conference to review, edit and sign short form petition. Discuss case in general.	PK	0.70	210.00
				1.90	570.00
9/18/2019	B	Review girlfriends credit report	PK	0.20	60.00
9/26/2019	B	Work on petition including preparing short form petition.	PK	1.00	300.00
9/27/2019	B	Review email and certificate from Summit and and follow up filing.	PK	0.30	90.00
9/27/2019	B	Finish short form petition.	PK	0.20	60.00
10/9/2019	B	Finish petition	PK	1.10	330.00
10/10/2019	B	Client conference to review, edit and sign petition.	PK	0.70	210.00
				3.50	1,050.00
10/9/2019	E	Draft plan	PK	1.20	360.00
10/10/2019	E	Client conference to review, edit and sign plan.	PK	0.20	60.00
12/4/2019	E	Review email from trustee's office re: OCP. Review ans sign OCP. Email to trustee's office.	PK	0.20	60.00
				1.60	480.00
11/1/2019	F	Review notice of commencement of case, calendar 341 Meeting of Creditors	PK	0.20	60.00
11/26/2019	F	Preparation for and appear at 341 Meeting of Creditors	PK	1.00	300.00
				1.20	360.00
6/19/2020	J	Review notice of filed claims, letter to client re: same. Review of p o c on house. Check file and PACER for additional claims.	PK	0.40	120.00
				0.40	120.00
4/17/2020	K	Review motion to dismiss. Follow up resolution.	PK	0.40	120.00
5/4/2020	K	Review withdrawal of trustee's motion to dismiss	PK	0.10	30.00
				0.50	150.00
12/13/2023	N	Draft final fee application	PK	2.00	600.00
				2.00	600.00

EXHIBIT C
TIME BY TASK

3/15/2024 O	[Projected/estimated] Case closing.	PK	<u>2.00</u>	<u>600.00</u>
			<u>2.00</u>	<u>600.00</u>
9/22/2019 P	Draft letter/fax to First American Title (foreclosure trustee) re: filing of bankruptcy and automatic stay. Follow up Telephone call.	PK	0.30	90.00
9/30/2019 P	Trip to foreclosure sale to notify them of bankruptcy. (NB: we were advised that it takes 24 hours to be effective.)	PK	0.50	150.00
10/1/2019 P	Review trustee document request.	PK	0.10	30.00
10/2/2019 P	Review Notice of incomplete filing. Confirm that deadline is calendared.	PK	0.10	30.00
10/7/2019 P	Review request for special notice - Wilmington Savings Bank	PK	0.10	30.00
10/15/2019 P	Document collection for trustee.	PK	0.70	210.00
10/16/2019 P	TC-Lindsay at trustee's office.	PK	0.20	60.00
12/19/2019 P	Client conference to review TFS procedure, what to do in case.	PK	0.40	-
1/11/2020 P	Review notice of intent to close without discharge-no second class. Email to client re: same.	PK	0.30	90.00
1/20/2020 P	Review statement from Seline. Letter to client re: same.	PK	0.20	-
2/12/2020 P	Review certificate of debtor education.	PK	0.10	30.00
2/13/2020 P	Client telephone conference re: his inability to get a statement that shows what the late fee is.	PK	0.20	60.00
2/19/2020 P	Review notice of mortgage change, letter to client re: same.	PK	0.20	60.00
4/2/2020 P	Review email from client and respond.	PK	0.10	30.00
5/12/2020 P	Review order as signed by Court.	PK	0.10	30.00
5/13/2020 P	Client telephone conference re: letter from trustee re: payment increase. (I have not rec'd letter). Review letter later in day.	PK	0.20	60.00
5/14/2020 P	Client telephone conference re: letter from trustee re: payment increase.	PK	0.20	60.00
8/25/2020 P	Review statement from Selene Financial. Letter to Selene with copy of letter and statement to client, requesting that they send statements to client rather than to me.	PK	0.30	90.00
12/14/2020 P	Brief review of trustee's annual report and letter to client re: same	PK	0.20	60.00
1/19/2021 P	Client telephone conference re: to complete	PK	0.20	60.00
8/27/2021 P	Client telephone conference re: re: to complete	PK	0.10	30.00

EXHIBIT C
TIME BY TASK

2/2/2022	P	Review notice of mortgage payment change and letter to client re: same	PK	0.20	60.00
2/23/2022	P	Review change in mortgage payment and letter to client re: same	PK	0.20	60.00
4/4/2022	P	Review notice of change of address for QWR	PK	0.10	30.00
6/6/2022	P	Review notice of change of address- Wilmington Savings	PK	0.10	30.00
12/20/2022	P	Review notice of mortgage payment change and letter to client re: same	PK	0.20	60.00
11/29/2023	P	Review email/letter from Mai Ko Vang at trustee's office.	PK	0.10	30.00
12/18/2023	P	Review notice of mortgage change, letter to client re: same.	PK	0.20	60.00
				<u>5.90</u>	<u>1,590.00</u>

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TIME BY TASK